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Associates, LLC, *et al.*, Debtors-in-Possession

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CASE NO. 11-

Chapter 11
(Joint Administration Pending)

In re:

INTEGRAL NUCLEAR ASSOCIATES,
LLC, *et al.*,

Debtors-in-Possession.

**NOTICE OF MOTION FOR ENTRY OF
(A) INTERIM AND FINAL ORDERS
PURSUANT TO 11 U.S.C. §§ 105, 361,
362, 363 AND 364, RULES 2002, 4001,
AND 9014 OF THE FEDERAL RULES
OF BANKRUPTCY PROCEDURE, AND
THE COURT'S GENERAL ORDER
ADOPTING GUIDELINES FOR
FINANCING REQUESTS: (I)
AUTHORIZING DEBTORS TO OBTAIN
POSTPETITION FINANCING ON
SUPERPRIORITY AND SECURED
BASIS, (II) PERMITTING THE USE OF
CASH COLLATERAL AND GRANTING
ADEQUATE PROTECTION
THEREFORE PURSUANT TO 11 U.S.C.
§§ 361 AND 363, (III) GRANTING
INTERIM RELIEF, AND (IV)
SCHEDULING A FINAL HEARING
UNDER BANKRUPTCY RULE 4001(c)
ON EACH REQUESTED FINAL ORDER**

HEARING DATE AND TIME:
February __, 2011, at __:__ __.m.

ORAL ARGUMENT REQUESTED

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that pursuant to an Order Regarding Application For Expedited Consideration of First Day Matters served herewith, on the ____ day of February, 2011, at ____ .m., or as soon thereafter as counsel may be heard, the undersigned, proposed attorneys for Integral Nuclear Associates, LLC, *et al.*, the within debtors and debtors-in-possession (collectively, the “Debtors”),¹ shall move before the assigned United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Third Floor, Newark, New Jersey 07102, pursuant to 11 U.S.C. §§ 105, 362, 363, 364, and 507 and Rules 2002, 4001 and 9014 of the Federal Rules of Bankruptcy Procedure for entry of an interim order and a final order: (i) approving post-petition financing in the amount of \$300,000, as more fully set forth in the general term sheet for plan support and debtor-in-possession financing dated February 3, 2011, interim and final financing orders, and any other instrument, agreement or ancillary document as Monarch Medical PET Services LLC or its nominee (“Monarch”) deems necessary between the Debtors and Monarch, (ii) granting liens and providing super-priority administrative expense status, (iii) authorizing use of cash collateral, (iv) modifying the automatic stay and (vi) scheduling a final hearing (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the Affidavit of Ronald J. Lissak in support of “First Day Motions,” and the accompanying Verified Application, which set forth the factual and legal bases upon which the

¹ In addition to Integral Nuclear Associates, LLC, the Debtors in these Chapter 11 cases are: Doylestown PET Associates, LLC, Imaging Technology Associates, LLC, Integral Mobile PET/CT, LLC, Integral PET Associates, LLC, Integral PET Holdings, LLC, Integral PET Holdings II, LLC, Limerick PET Associates LLC, Meadowbrook PET Associates, LLC, Mobile PET/CT Associates, LLC, Nuclear Management, Inc., and Pennsylvania PET Associates, LLC.

requested relief should be granted. A proposed Interim Order granting the relief requested in the Motion also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the requested relief in the Motion shall be presented in accordance with the Order Regarding Application for Expedited Consideration of First Day Matters.

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the requested relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion.

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.
Proposed Attorneys for Integral Nuclear
Associates, LLC, *et al.*, Debtors-in-Possession

By: /s/ Ilana Volkov
Ilana Volkov
Ryan T. Jareck

DATED: February 3, 2011